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706 Sansome Street
San Francisco, CA 94111
Telephone: (415) 217-6810
Facsimile: (415) 217-6813

Lead Counsel for Direct Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

ALL DIRECT PURCHASER ACTIONS

**DECLARATION OF R. ALEXANDER
SAVERI IN SUPPORT OF DIRECT
PURCHASER PLAINTIFFS' MOTION FOR
CHUMAN CERTIFICATION OF THE IRICO
DEFENDANTS' APPEAL**

Date: February 5, 2020

Time: 2:00 p.m.

Judge: Honorable Jon S. Tigar

Courtroom: 6 - 2nd Floor

1 I, R. Alexander Saveri, declare:

2 1. I am the Managing Partner of Saveri & Saveri, Inc., Lead Counsel for Direct
3 Purchaser Plaintiffs (“DPPs”) in this action. I am a member of the Bar of the State of California
4 and admitted to practice in the Northern District of California. I make this Declaration in Support
5 of DPPs’ Motion for *Chuman* Certification of the Irico Defendants’ Appeal. Except as otherwise
6 stated, I have personal knowledge of the facts stated below.

7 2. I have been involved in virtually every aspect of this case from its outset in 2007.

8 3. On September 7, 2017, I received an email from Carl W. Oberdier of Oberdier
9 Ressmeyer LLP informing me of his firm’s representation of the Irico Defendants in this action and
10 requesting a delay in the briefing schedule on the Default Application. Attached hereto as Exhibit 1
11 is a true and correct copy of Mr. Oberdier’s email to me, dated September 7, 2017.

12 4. On March 5, 2018, DPPs served jurisdictional discovery on the Irico Defendants.
13 On October 10, 2018, the Irico Defendants served on DPP counsel, including me, their third
14 supplemental responses to DPPs’ requests for production of documents as well as a declaration in
15 support thereof. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of
16 Yunlong Yan in Support of Irico Defendants’ Third Supplemental Objections and Responses to
17 Direct Purchaser Plaintiff Studio Spectrum, Inc.’s First Set of Requests for Production of
18 Documents, dated October 10, 2018.

19 5. On September 12, 2018, DPP counsel confirmed by letter to Mr. Plunkett that the
20 depositions of three Irico witnesses would take place in Hong Kong beginning on September 24,
21 2018. Attached hereto as Exhibit 3 is a true and correct copy of a letter from Geoffrey C. Rushing
22 of my firm to Mr. Plunkett, dated September 12, 2018.

23 6. On September 14, 2018, I received a letter from Mr. Plunkett regarding the
24 production of documents Bates labeled IRI-CRT-00001199 through -3489. Attached hereto as
25 Exhibit 4 is a true and correct copy of Mr. Plunkett’s letter, dated September 14, 2018. The
26 depositions were rescheduled from September 24, 2018 to November 5, 2018 so that there would
27 be sufficient time to review, translate, and analyze all of these documents prior to the depositions.
28

7. On September 26, 2018, the Special Master issued an Order Granting DPPs' Motion to Compel Compliance with 8/2/2018 Order re Jurisdictional Discovery, ECF No. 5331 (adopted by ECF No. 5352), and an Order Granting IPPs' Motion to Compel Jurisdictional Discovery. ECF No. 5332 (adopted by ECF No. 5353). In early October 2018, Mr. Plunkett informed counsel for DPPs and IPPs that the Irico Defendants could not comply with the orders in time for any new documents to be used in the depositions scheduled to begin on November 5, 2018. Attached hereto as Exhibit 5 is a true and correct copy of an email from Mr. Rushing to Mr. Plunkett regarding the postponement, dated October 9, 2018. The depositions were subsequently scheduled and held in Hong Kong during the week of March 4, 2019.

8. In connection with their Default Judgment Application, DPPs summarized twenty-six meetings in Exhibit 11 to the Declaration of R. Alexander Saveri dated December 7, 2017 (ECF No. 5228-1). Meeting notes and other documents produced by other defendants relating to the twenty-six meetings identify twelve individuals that DPPs understood to be employed by the Irico Defendants. In response to DPPs' request for information about certain potential witnesses, a chart provided by counsel for the Irico Defendants in June 2018 indicated that only two of them—Su Xiaohua (苏晓华) and Wang Zhao-Jie (王昭杰)—were employed by the Irico Defendants at that time. Attached hereto as Exhibit 6 is a true and correct copy of an email, with attachment, from Tom Carter of Baker Botts LLP to Mr. Rushing and Matthew D. Heaphy of my firm, and copied to me and other counsel. In addition, the Irico Defendants made available two former employees who were identified as meeting attendees: Guo Mengquan (郭盟权) and Zhang Shaowen (张少文). However, Mr. Guo was unable to travel to Hong Kong for deposition for health reasons. The Irico Defendants have not made any representations about whether Messrs. Guo and Zhang would be made available in future proceedings.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27th day of November, 2019 in San Francisco, California.

/s/ R. Alexander Saveri
R. Alexander Saveri

EXHIBIT 1

Matthew Heaphy

From: Carl W. Oberdier <cwo@oberdier.com>
Sent: Thursday, September 7, 2017 10:35 AM
To: Guido Saveri; Rick Saveri; Matthew Heaphy; Cadio Zirpoli
Cc: Kellen G. Ressmeyer; Sara K. Hunkler
Subject: In re: Cathode Ray Tube (CRT) Antitrust Litigation -- Motion for Default Judgment Against Irco

Dear Counsel,

We were retained this morning to represent the Irco defendants in the CRT Antitrust litigation.

Irco intends to oppose the Direct Purchaser Plaintiffs' motion for default judgment. We request Plaintiffs' consent to an extension of a month from the current deadline of September 13, 2017, until October 13, 2017, of Irco's time to submit its opposition papers. We need this additional time to get up to speed and prepare Irco's opposition. If Plaintiffs consent, we will prepare a stipulation for approval by the Court.

Please let me know if Plaintiffs consent or if you would like to discuss this request. I am out of the office today but available for a telephone conference if needed.

Best regards,

Carl W. Oberdier

OBERDIER RESSMEYER LLP

655 3rd Avenue | 28th Floor | New York, NY 10017

tel: (212) 659-5141 | fax: (646) 349-4925

cwo@oberdier.com | www.oberdier.com



This message and any attachments may contain confidential information protected by the attorney-client or other privilege. If you believe that it has been sent to you in error, please reply to the sender that you received the message in error. Then delete it. Thank you.

EXHIBIT 2

John Taladay (*pro hac vice*)
john.taladay@bakerbotts.com
Erik T. Koons (*pro hac vice*)
erik.koons@bakerbotts.com
BAKER BOTTS LLP
1299 Pennsylvania Ave., NW
Washington, D.C. 20004
Telephone: (202)-639-7700
Facsimile: (202)-639-7890

Stuart C. Plunkett (State Bar No. 187971)
stuart.plunkett@bakerbotts.com
BAKER BOTTS LLP
101 California Street, Suite 3600
San Francisco, California 94111
Telephone: (415) 291-6200
Facsimile: (415) 291-6300

Attorneys for Defendants
Irico GROUP CORP. and
Irico DISPLAY DEVICES CO., LTD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

) Case No. 3:07-cv-05944-JST

) MDL No.: 1917

THIS DOCUMENT RELATES TO:
ALL DIRECT PURCHASER ACTIONS

) **DECLARATION OF YUNLONG YAN IN**
) **SUPPORT OF IRICO DEFENDANTS'**
) **THIRDSUPPLEMENTAL OBJECTIONS**
) **AND RESPONSES TO DIRECT**
) **PURCHASERPLAINTIFF STUDIO**
) **SPECTRUM, INC.'S FIRST SET OF**
) **REQUESTS FOR PRODUCTION OF**
) **DOCUMENTS**

DECL. OF YAN ISO IRICO'S THIRD SUPP. RESP.
DPPS FIRST SET OF RFPS

CASE No. 3:07-cv-05944-JST
MDL No. 1917



1 I, Yunlong Yan, declare as follows:

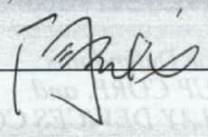
2 1. I am General Counsel of Irigo Group Corporation.

3 2. Irigo Group Corporation and Irigo Display Devices Co, Ltd. (together, "Irigo") has
4 completed its search for documents responsive to Request No. 10 of the Direct Purchaser
5 Plaintiff Studio Spectrum, Inc.'s First Set of Requests for Production of Documents.

6 3. Irigo has not located any responsive documents.

7 I declare under penalty of perjury under the laws of the United States that the foregoing is
8 true and correct.

9 Executed this 10th day of October 2018 in Xianyang City, Shaanxi Province, China.

10 /s/ Yunlong Yan 
11 Yunlong Yan
12 General Counsel
13 Irigo Group Corporation

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DECL. OF YAN ISO IRICO'S THIRD SUPP. RESP.
DPPS FIRST SET OF RFPS

1

CASE NO. 3:07-cv-05944-JST
MDL No. 1917



EXHIBIT 3

SAVERI & SAVERI, INC.
706 SANSOME STREET
SAN FRANCISCO, CALIFORNIA 94111
TELEPHONE: (415) 217-6810
TELECOPIER: (415) 217-6813

September 12, 2018

VIA EMAIL

Stuart C. Plunkett
Baker Botts LLP
101 California Street, Suite 3600
San Francisco, California 94111
stuart.plunkett@bakerbotts.com

Re: *In re Cathode Ray Tube (CRT) Antitrust Litigation* – MDL No. 1917,
Master File No. 07-CV-5944-JST

Dear Stuart:

Thank you for your voice-mail message of yesterday. This will confirm that the depositions of Zhang Wenkai, Guo Mengquan and Wang Zhaojie, both in their individual capacities and as 30(b)(6) designees on behalf of Group and Display, will go forward as follows:

1. Monday and Tuesday, September 24–25, 2018: Mr. Wang
2. Wednesday, September 26, 2018: Mr. Zhang
3. Thursday and Friday, September 27–28, 2018: Mr. Guo

The depositions will take place in Hong Kong and will begin at 9:00 a.m. We have agreed that they will continue into the evening as reasonably necessary.

We are in the process of booking a conference room for the depositions. We will notify you of the address when we have done so. We expect to book one in the Central neighborhood.

I understand that the witnesses will require interpreters. Please confirm that you will be arranging for them per the Court's Order re Discovery and Case Management Protocol, ECF No. 1128 (Apr. 3, 2012), enclosed herewith.

The people who are attending for DPPs and IPPs are booking, or have already booked, flights and hotel rooms. We are booking the Court Reporter and Videographer. Please notify me immediately if the depositions will not go forward as stated above.

Stuart C. Plunkett

9/12/2018

Page 2

Thank you.

Very truly yours,

s/ Geoffrey C. Rushing

Geoffrey C. Rushing

Enclosure.

Cc: John Taladay
Erik T. Koons
Thomas E. Carter
Ashley Eickhof
Kaylee Yang
Mario N. Alioto
Lauren C. Capurro
Christopher T. Micheletti
Joseph M. Patane

crt.706

EXHIBIT 4

BAKER BOTTS LLP

101 CALIFORNIA ST.
SUITE 3600
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HONG KONG
HOUSTON

LONDON
MOSCOW
NEW YORK
PALO ALTO
RIYADH
SAN FRANCISCO
WASHINGTON

September 14, 2018

VIA E-MAIL

R. Alexander Saveri (E-mail: rick@saveri.com)
Geoffrey C. Rushing (E-mail: grushing@saveri.com)
Cadio Zirpoli (E-mail: cadio@saveri.com)
Matthew D. Heaphy (E-mail: mheaphy@saveri.com)
SAVERI & SAVERI, INC.
706 Sansome St # 200
San Francisco, CA 94111

Stuart C. Plunkett
TEL: 415.291.6203
FAX: 415.291.6303
stuart.plunkett@bakerbotts.com

Re: In re: Cathode Ray Tube (CRT) Antitrust Litigation -
Master File No. 3:07-cv05944-SC; MDL No. 1917

Counsel:

Irico Defendants are electronically producing documents Bates labeled IRI-CRT-00001199 through -3489, which can be downloaded at the following link:

Link: <https://bbmft.bakerbotts.com/pkg?token=3ca2579a-0f78-40bc-a306-da7a42e71c45>

Passwords to access the download link and extract the files will be sent under separate cover. Irico Defendants designate this submission as "Confidential" pursuant to the Stipulated Protective Order.

This production contains additional nonprivileged electronic documents located by Irico that are responsive to Plaintiffs' discovery requests, including:

1. Reports, requests for approval, and other communications with Chinese government entities and related internal communications;
2. Directives from Chinese government entities and related internal communications;
3. Agendas and summaries of internal meetings, shareholder meetings, and meetings with Chinese government officials;
4. Organizational charts;

5. Internal planning and strategy documents;
6. Documents related to restructuring of Irico entities; and
7. Records of remarks given by Irico management and Chinese government officials.

Irico did not locate any responsive, nonprivileged documents in its electronic files relating to alleged conspiratorial meetings or sales of Irico CRT products to the United States (by Irico entities or third parties).

If you have any questions or have difficulty accessing these documents, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stuart C. Plunkett', with a long horizontal flourish extending to the right.

Stuart C. Plunkett

cc: Mario N. Alioto (malieto@tatp.com)
Lauren C. Capurro (lauren russell@tatp.com)
Joseph M. Patane (jpatane@tatp.com)
Christopher Micheletti (cmicheletti@zelle.com)

EXHIBIT 5

Matthew Heaphy

From: Geoff Rushing
Sent: Tuesday, October 09, 2018 2:28 PM
To: stuart.plunkett@bakerbotts.com; john.taladay@bakerbotts.com
Cc: erik.koons@bakerbotts.com; Matthew Heaphy; Lauren Capurro (Russell); CMicheletti@zelle.com; 'Qianwei Fu'; Rick Saveri
Subject: Hong Kong Depos -- CRT litigation

Stuart:

In light of your representation that Irco cannot fully comply with Judge Walker's recent orders in time for the new documents, etc. to be used in the depositions scheduled for November 5-9, and the uncertainties created by Irco's objections to those orders, DPPs and IPPs agree that the depositions should be rescheduled. We would like to aim for mid to late January 2019. That would seem to give your clients ample time to do the work required by the orders, and avoid problems with the holidays.

Please let me know your thoughts on this.

Geoff

EXHIBIT 6

Matthew Heaphy

From: Tom.Carter@BakerBotts.com
Sent: Friday, June 29, 2018 6:02 AM
To: Matthew Heaphy
Cc: erik.koons@bakerbotts.com; Ashley.Eickhof@BakerBotts.com; stuart.plunkett@bakerbotts.com; kaylee.yang@bakerbotts.com; john.taladay@bakerbotts.com; Rick Saveri; Geoff Rushing; Cadio Zirpoli; malioto@tatp.com; lauren russell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com; reilly.stoler@bakerbotts.com
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST
Attachments: Irico Supplemental Response to Potential Deponent Info Request.pdf

Dear Matt & Geoff:

Please see the attached supplemental response by Irico to your information request regarding potential deponents. Irico disputes the contention in your June 21, 2018 letter that we agreed to provide all the information described in your letter regarding the individuals listed in our Interrogatory responses, and such information is not required under the Court's Order Re Discovery and Case Management Protocol (Dkt. 1128). However, Irico is providing information below on these employees' current or most recent title, and will search for and provide information on prior positions held by each employee that are relevant to their knowledge of information covered by Irico's Interrogatory responses.

1. Guo Mengquan (former employee, retired May 2017): former Deputy General Manager, Irico Group
2. Hou Ruijin (current employee): Asset Manager, Irico Group
3. Long Tao (current employee): Secretary of the office of Board of Directors, Irico Display
4. Yan Yunlong (current employee): General Counsel, Irico Group
5. Zhang Shaowen (former employee, retired Mar. 2016) - former Deputy General Manager, Irico Group
6. Zhu Xiaohang (current employee): Secretary of the office of Board of Directors, Irico Electronics

Best,
Tom Carter

From: Matthew Heaphy <mheaphy@saveri.com>
Sent: Thursday, June 21, 2018 6:35 PM
To: Carter, Tom <Tom.Carter@BakerBotts.com>
Cc: Koons, Erik <erik.koons@bakerbotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; Rick Saveri <Rick@saveri.com>; Geoff Rushing <Geoff@saveri.com>; Cadio Zirpoli <cadio@saveri.com>; malioto@tatp.com; lauren russell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com; Stoler, Reilly <reilly.stoler@bakerbotts.com>
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Tom:

Please see the attached correspondence from Geoff Rushing.

Best,
Matt

Matthew Heaphy
Saveri & Saveri, Inc.
706 Sansome Street
San Francisco, CA 94111
mheaphy@saveri.com
Telephone: (415) 217-6810
Facsimile: (415) 217-6813

From: Tom.Carter@BakerBotts.com [<mailto:Tom.Carter@BakerBotts.com>]
Sent: Tuesday, June 19, 2018 5:30 PM
To: Matthew Heaphy
Cc: erik.koons@bakerbotts.com; Ashley.Eickhof@BakerBotts.com; stuart.plunkett@bakerbotts.com; kaylee.yang@bakerbotts.com; john.taladay@bakerbotts.com; Rick Saveri; Geoff Rushing; Cadio Zirpoli; malioto@tatp.com; lauren russell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com; reilly.stoler@bakerbotts.com
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Matt:

Please see the attached for additional information Irco has gathered in response to your request regarding potential Irco deponents.

Best,
Tom Carter

From: Carter, Tom
Sent: Friday, June 8, 2018 12:39 PM
To: 'Matthew Heaphy' <mheaphy@saveri.com>
Cc: Koons, Erik <erik.koons@bakerbotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; 'Rick Saveri' <Rick@saveri.com>; 'Geoff Rushing' <Geoff@saveri.com>; 'Cadio Zirpoli' <cadio@saveri.com>; 'malioto@tatp.com' <malioto@tatp.com>; 'lauren russell@tatp.com' <lauren russell@tatp.com>; 'jpatane@tatp.com' <jpatane@tatp.com>; 'CMicheletti@zelle.com' <CMicheletti@zelle.com>; Stoler, Reilly <reilly.stoler@bakerbotts.com>
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Matt:

Irco is working on gathering last known addresses for all the former employees on your list that are not currently represented by us, and we expect to have those for you by next week at the latest. With regard to the individuals identified as having knowledge in Irco's interrogatory responses, all of them are represented by us and may be contacted through counsel. With the exception of Mr. Guo Mengquan and Mr. Zhang Shaowen, all of these individuals are current employees of Irco. We will also provide you with their current titles by next week.

Best regards,
Tom Carter

From: Matthew Heaphy <mheaphy@saveri.com>
Sent: Thursday, June 7, 2018 3:18 PM
To: Carter, Tom <Tom.Carter@BakerBotts.com>
Cc: Koons, Erik <erik.koons@bakerbotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; Rick Saveri <Rick@saveri.com>; Geoff Rushing <Geoff@saveri.com>; Cadio Zirpoli

<cadio@saveri.com>; malioto@tatp.com; lauren russell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com

Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Tom:

Please see the attached correspondence from Geoff Rushing.

Best,
Matt

Matthew Heaphy
Saveri & Saveri, Inc.
706 Sansome Street
San Francisco, CA 94111
mheaphy@saveri.com
Telephone: (415) 217-6810
Facsimile: (415) 217-6813

From: Tom.Carter@BakerBotts.com [<mailto:Tom.Carter@BakerBotts.com>]
Sent: Tuesday, June 05, 2018 10:05 PM
To: Rick Saveri; Cadio Zirpoli; malioto@tatp.com; lauren russell@tatp.com; jpatane@tatp.com; CMicheletti@zelle.com; Geoff Rushing; Matthew Heaphy
Cc: erik.koons@bakerbotts.com; Ashley.Eickhof@BakerBotts.com; stuart.plunkett@bakerbotts.com; kaylee.yang@bakerbotts.com; john.taladay@bakerbotts.com
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

Dear Counsel:

Please see attached for Irico's responses to the request in your April 9, 2018 letter regarding potential Irico deponents. Irico has identified the employment status (and departure date, if relevant) of 35 out of the 36 individuals named in your list. Irico has been unable to locate information regarding Liu Linghai; if you could share more detail on how Liu Linghai was chosen for your list, that may help with providing the information you requested. All current Irico employees and individuals identified in Irico's interrogatory responses will be represented by us and can be reached through counsel.

Given the large number of former Irico employees on the list, including many that left the company more than 5 years ago, we request that plaintiffs consider the information provided thus far and narrow the list so that Irico can better prioritize the burdensome task of reaching out to each of these former employees to determine if they would accept representation by counsel for Irico.

Thank you,

Tom Carter
Associate

Baker Botts L.L.P.
tom.carter@bakerbotts.com
T +1.202.639.7702
F +1.202.585.4085
M +1.202.412.4352

The Warner
1299 Pennsylvania Ave NW

Washington, DC 20004
USA



Admitted to practice in New York and the District of Columbia.

From: Rick Saveri <Rick@saveri.com>
Sent: Monday, April 9, 2018 1:31 PM
To: Taladay, John <john.taladay@bakerbotts.com>
Cc: Koons, Erik <erik.koons@bakerbotts.com>; Carter, Tom <Tom.Carter@BakerBotts.com>; Eickhof, Ashley <Ashley.Eickhof@BakerBotts.com>; Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Yang, Kaylee <kaylee.yang@bakerbotts.com>; Geoff Rushing <Geoff@saveri.com>; Matthew Heaphy <mheaphy@saveri.com>
Subject: RE: In re Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917, Master File No. 07-CV-5944-JST

John: Please see attached letter.

Rick

R. Alexander Saveri
Saveri & Saveri, Inc.
706 Sansome Street
San Francisco, CA 94111
Tel: (415) 217-6810
Fax: (415) 217-6813

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Irico's Supplemental Response to Potential Deponent Information Request

Name	Name (Chinese)	Current or Former Employee	Date of Departure	Contact Information/ Last Known Address
Chen Di Zhi	陈德智	Former	Apr. 2002	No address found
Chen Xiaoning	陈晓宁	Current	n/a	May be contacted through counsel
Duan Cheng	段诚	Former	June 2015	咸阳市人民路彩虹新区 152#-2-6-11 邮编 710021
Fang Liang-Jun	方良军	Former	June 2012	咸阳市人民路彩虹新区 113#-2-4-7 邮编 710021
Fu Jiuquan	符九全	Former	Mar. 2011	No address found
Gao Rong-Guo	高荣国	Current	n/a	May be contacted through counsel
Ge Di	葛迪	Former	May 2016	咸阳市秦都区渭滨街道阳光小区 10 号楼 邮编 710021
Guo Mengquan	郭盟权	Former	May 2017	May be contacted through counsel
Li Wei-Sheng	李卫生	Former	Jan. 2002	No address found
Liang Yuan	梁援	Former	Mar. 2014	咸阳市人民路彩虹小区 5-1-3-5 邮编 710021
Liu Hongwu	刘宏武	Former	Jan. 2014	No address found
Liu Linghai				No information found
Liu Xiaodong	刘晓东	Former	May 2010	No address found
Ma Jinquan	马金泉	Former	Feb. 2005	咸阳市人民路/彩虹新区 115#-1-5-10 邮编 710021
Niu Xinan	牛新安	Former	Dec. 2015	咸阳市人民路彩虹新区 115#-2-5-东户 邮编 710021
Shan or Sa Tao	沙涛	Former	Dec. 2002	No address found
Shen Xiaolin	申小琳	Former	Oct. 2015	咸阳市人民路彩虹新区 115#-1-5-10 邮编 710021
Song Shi-Zhen	宋世振	Former	Nov. 2004	咸阳市彩虹一路彩虹老区 52#-4-3-6 邮编 710021
Su Xiaohua	苏晓华	Current	n/a	May be contacted through counsel
Tao Kui	陶魁	Former	Mar. 2014	No address found
Wang Da-Ming	王大明	Former	July 2004	No address found
Wang Li Guang	王李广	Former	Apr. 2002	No address found
Wang Ping-Quan	王平权	Former	Mar. 2012	咸阳市人民路彩虹新区 137#-6-2-3 邮编 710021
Wang Zhao-Jie	王昭杰	Current	n/a	May be contacted through counsel
Wei Jian-She	魏建社	Former	Apr. 2018	珠海番溪庄 27-1-405 邮编 519000
Wei Zhiyuan	魏致远	Former	Sept. 2006	No address found

Irico's Supplemental Response to Potential Deponent Information Request

Name	Name (Chinese)	Current or Former Employee	Date of Departure	Contact Information/ Last Known Address
Wen Haiyang	文海洋	Former	Sept. 2017	咸阳市彩虹一路彩虹新家园 B 座 1 单元六层 12 号 邮编 710021
Xi Jiansheng	奚建生	Former	Apr. 2006	No address found
Xing Daoqin	邢道钦	Deceased	Dec. 2011	n/a
Xu Gao-Wen	许高文	Former	Oct. 2014	咸阳市彩虹一路彩虹小区 85#-3-3-5 邮编 710021
Yao Jun	姚军	Former	Apr. 2018	咸阳市建设路彩虹北家属区 70 号楼 邮编 710021
Zhang Junhua	张君华	Current	n/a	May be contacted through counsel
Zhang Shaowen	张少文	Former	Mar. 2016	May be contacted through counsel
Zhang Hushan	张虎山	Former	May 2018	咸阳市人民西路彩虹劳司 E-1-8-16 邮编 710021
Zhen Xiao-Hong	甄小红	Former	Feb. 2014	No address found
Zhu Jian	竺简	Former	Dec. 1998	No address found